

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ROSA RAMIREZ, on behalf of herself and all other)  
persons similarly situated, known and unknown, )

Plaintiff, )

v. )

STAFFING NETWORK HOLDINGS, LLC d/b/a )  
STAFFING NETWORK and PHILIPS )  
ELECTRONICS NORTH AMERICA )  
CORPORATION, and PONTOON SOLUTIONS, )  
INC. )

Case No. 13 C 6501

Judge Lee

Magistrate Judge Valdez

**PLAINTIFF’S PETITION FOR  
REASONABLE ATTORNEYS’ FEES AND COSTS**

Plaintiff, through her attorneys, respectfully request this Court grant her petition for reasonable attorneys’ fees and costs expended litigating and obtaining a settlement on a class-wide basis for putative Class Members in the above referenced matter. In support of this petition, Plaintiff states as follows:

1. In this class action lawsuit filed in the U.S. District Court for the Northern District of Illinois on September 11, 2013, *Rosa Ramirez v. Staffing Network Holding LLC, Philips Electronics North America Corporation, and Pontoon Solutions Inc.*, Case No. 13 C 6501, the Named Plaintiff alleged that Defendants Staffing Network Holdings LLC ( “Staffing Network”), Philips Electronics North America Corporation ( “Philips”), and Pontoon Solutions Inc., (“Pontoon”) (collectively “Defendants”) failed to pay her for all time worked by requiring Plaintiff and Class Members to perform pre and post shift work in the form of compensable travel time and “engaged to wait” time without compensation, resulting in the violations of the FLSA, IMWL, IWPCA and IDTLSA. Plaintiff also alleged violations by Defendants of the notice requirements of the IDTLSA.

2. The above referenced parties reached a settlement on a classwide basis (“the Settlement”) that was preliminarily approved by this Court on March 10, 2015. (D.E. 132). This matter is set for a hearing on final approval on July 24, 2015 at 11:00 AM. The settlement preliminarily approved by the Court allowed for an award of attorney fees and costs in an amount of up to 33% of the settlement amount, or \$83,333.33 (D.E. 132).

3. The Parties negotiated a Class Settlement Fund which would allow Settlement Class Members to obtain a pro rata share of their maximum settlement payment which was calculated based on Plaintiffs' theory of the case.

4. Class Counsel has obtained an excellent result for the Class in this matter. The two hundred and eighty one (281) members of the class who filed claims to date (9.59%) will receive a settlement payment for the full value of the estimated damages that Plaintiff's Counsel had calculated for each Class Member during the settlement negotiations, plus approximately 17% in liquidated damages. Only a small number of Class Members (7) timely excluded themselves from the Settlement. Furthermore, not one Settlement Class Member objected to the Settlement. The average award in this matter will be \$433.03, with the maximum award being \$5,372.03, and the minimum award, for a Settlement Class Member who worked less than an eight hour shift for Defendants during the class period being \$1.82. This is an excellent result for participating Class Members.

5. Class Counsel's lodestar fee amount litigating this matter today, after multiple time entries were deleted for purposes of preparing this fee petition, is approximately \$87,841.00, plus \$7,650.54 in costs. A computer printout detailing the work performed and time expended by me, and other Workers' Law Office, PC staff on this matter is attached hereto as Attachment 1.

6. Plaintiffs' Counsel believes that expenses in the amount of \$7,650.54 and

attorneys' fees in the amount of \$87,841.00, as specified below and on Attachment 1, attached hereto, are reasonable.

7. Since the inception of this case, Christopher J. Williams has spent over 44 hours at \$450/hr or \$19,800.00 in this matter, see Declaration of Christopher J Williams, (hereinafter Williams Decl ¶\_\_), attached hereto as Attachment 2. Alvar Ayala has spent over 166 hours at \$325/hr or approximately \$53,950.00 in this matter, see Declaration of Alvar Ayala, (hereinafter Ayala Decl ¶\_\_), attached hereto as Attachment 3. Paralegals spent over 22 hours at \$135/hr. or approximately \$2,970.00 ;

8. The amount sought in fees and costs in this matter, \$75,000.00, is the equivalent of 30% of the settlement amount in the above referenced matter, which is less than the 33.33% contingency fee agreement with Plaintiff and significantly less than Class' Counsel lodestar amount of \$95,491.00, inclusive of costs.

9. Given the excellent result obtain by Class Counsel for participating Class Members and given Class Counsel's actual lodestar, Class Counsel believes that an award of \$75,000.00 in attorneys' fees and costs as part of this settlement (or 30% of the settlement amount) is reasonable.

Dated: July 22, 2015

Respectfully submitted,

s/Christopher J. Williams  
Christopher J. Williams  
Workers Law Office, PC  
53 W Jackson. Blvd, Suite 701  
Chicago, IL 60604  
(312) 795-9121

Plaintiff's Attorneys

# ATTACHMENT 1

**Total Attorneys' Fees**

Case Name	Staff Person	Activity Code	Activity	Description	Date	Hours	Rate	Fees
Ramirez v. SN	Williams, Christopher-Atty	1	Client Meeting	Mtg w/ Clients	4/16/2013	3.00	\$450.00	\$1,350.00
Ramirez v. SN	Williams, Christopher-Atty	11	Draft Pleadings	Draft Complaint	8/29/2013	3.00	\$450.00	\$1,350.00
Ramirez v. SN, Norelco	Perez, Alma-P/L	22	Research	Research the legal/corp name of Norelco	9/4/2013	0.50	\$135.00	\$67.50
Ramirez v. SN, Norelco	Perez, Alma-P/L	26	Other-(Specify)	preparing Ex A to complaint, civil cover sheet & atty apperances	9/11/2013	0.25	\$135.00	\$33.75
Ramirez v. SN, Norelco	Perez, Alma-P/L	26	Other-(Specify)	Filing Complaint, Civil Cover sheet & Atty Appearances for CJW & AA	9/11/2013	0.25	\$135.00	\$33.75
Ramirez v. SN, Norelco	Perez, Alma-P/L	6	Corr w/ OC	preparing wos packet for SN c/o Mat Gagnon. Sent to him via email & mail	9/13/2013	0.50	\$135.00	\$67.50
Ramirez, Rosa v. SN, Norelco	Perez, Alma-P/L	26	Other-(Specify)	filing executed WOS for staffing network & docketing answer deadline	9/18/2013	0.25	\$135.00	\$33.75
Ramirez, Rosa v. SN, Norelco	Perez, Alma-P/L	26	Other-(Specify)	preparing wos packet to be sent to philips electronics north america corp	9/18/2013	0.50	\$135.00	\$67.50
Ramirez v. SN, Norelco	Perez, Alma-P/L	27	Docketing	atty appearances for staffing network	9/23/2013	0.25	\$135.00	\$33.75
Ramirez v. SN, Norelco	Perez, Alma-P/L	27	Docketing	wos due deadline for norelco	9/24/2013	0.10	\$135.00	\$13.50
Ramirez v. Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	file class cert and NOM for class cert	10/10/2013	0.30	\$135.00	\$40.50
Ramirez v. Norelco	Velasquez, Jazmin-P/L	27	Docketing		10/10/2013	0.05	\$135.00	\$6.75
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	27	Docketing		10/18/2013	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	email gagnon and philips	10/29/2013	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	27	Docketing		10/29/2013	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	File executed WOS and Docket deadline on Abacus	10/29/2013	0.30	\$135.00	\$40.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	11	Draft Pleadings	Proposed stipulation not to issue offer of judgment	10/30/2013	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	27	Docketing		10/30/2013	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	21	File Review	review SN Answer to Complaint	11/13/2013	0.50	\$325.00	\$162.50
Ramirez v SN, Norelco	Ayala, Alvar-Atty	11	Draft Pleadings	Draft Joint Initial Status Report	12/4/2013	2.15	\$325.00	\$698.75
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	5	OC Call	conf call regarding initial status report	12/5/2013	0.50	\$325.00	\$162.50
Ramirez v. Staffing	Velasquez, Jazmin-P/L	27	Docketing		12/9/2013	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	8	MTN Hearing	Philips motion to dismiss	12/11/2013	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	Draft discovery to Defendant Staffing Network	12/27/2013	2.50	\$325.00	\$812.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	Draft discovery to Defendant Staffing Network	12/28/2013	1.50	\$325.00	\$487.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	review Philips motion to dismiss	1/3/2014	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Deliver discovery documents to Seyfath Shaw	1/3/2014	0.30	\$135.00	\$40.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	research philips motion to dismiss	1/4/2014	1.00	\$325.00	\$325.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	11	Draft Pleadings	respond philips motion to dismiss	1/6/2014	2.50	\$450.00	\$1,125.00
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Take Courtesy Copy to Judge Lee	1/9/2014	0.25	\$135.00	\$33.75
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Scan Staffing Network's 1st requests for production of documents and 1st set of interogs into server	1/9/2014	0.20	\$135.00	\$27.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	12	Draft non-Pleadings	Draft discovery to Philips	1/12/2014	2.50	\$450.00	\$1,125.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	12	Draft non-Pleadings	Draft discovery to Philips	1/13/2014	2.00	\$450.00	\$900.00
Ramirez v. SN, Norelco	Gaskin, Jeneé-Atty	13	Review/Revise	Reviewed Discovery requests	1/14/2014	0.75	\$225.00	\$168.75
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Prepare COS for Initial Disclosures	1/14/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	6	Corr w/ OC	Deliver initial Disclosures to Norelco and Staffing Network Attorneys	1/14/2014	0.45	\$135.00	\$60.75
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Convert Staffing Network's 1st requests and 1st set of interogs into word docs	1/14/2014	0.15	\$135.00	\$20.25
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Create COS for 1st set of interogs and 1st requests	1/15/2014	0.15	\$135.00	\$20.25
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	6	Corr w/ OC	Deliver Discovery docs to Norelco Attorneys	1/15/2014	0.35	\$135.00	\$47.25
Ramirez v. SN, Norelco	Williams, Christopher-Atty	7	Court Status	status hearing	2/11/2014	0.50	\$450.00	\$225.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	Draft Answers to SN discovery	2/14/2014	3.00	\$325.00	\$975.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	1	Client Meeting	meet client re discovery answers	2/16/2014	4.00	\$325.00	\$1,300.00

Ramirez v. SN, Norelco	Williams, Christopher-Atty	23	Staff Review	discuss answers to discovery	2/20/2014	0.75	\$450.00	\$337.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	21	File Review	review SN answers to p discovery	2/24/2014	1.00	\$325.00	\$325.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	37.2 correspondence to SN	2/24/2014	1.00	\$325.00	\$325.00
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Remove doc #28 and bait stamp docs again with bait numbers P00001 to P00049	2/24/2014	0.20	\$135.00	\$27.00
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	27	Docketing		2/28/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	meet client re discovery answers philips	3/4/2014	4.00	\$325.00	\$1,300.00
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Created a COS to deliver answers to Staffing Network	3/5/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	draft answers to philips discovery	3/8/2014	3.00	\$325.00	\$975.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	5	OC Call	conf. call donado	3/10/2014	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	37.2 correspondence to SN	1/0/1900	1.50	\$325.00	\$487.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	21	File Review	review philips answers to discovery	3/12/2014	1.00	\$325.00	\$325.00
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Drafted NOM for JNT MTN to ext discovery	3/13/2014	0.15	\$135.00	\$20.25
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Filed NOM and MTN to ext discovery	3/13/2014	0.20	\$135.00	\$27.00
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	27	Docketing		3/13/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Williams, Christopher-Atty	12	Draft non-Pleadings	Mtn to extend class discovery	3/13/2014	1.50	\$450.00	\$675.00
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Prepared cover letter to deliver courtesy copy to Judge Lee of P's MTN to ext discovery	3/14/2014	0.15	\$135.00	\$20.25
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	27	Docketing	Document #34	3/19/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	3	Client Correspondence	email to counsel philips, SN	3/20/2014	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	2	Client Call	conf call, philips counsel	3/20/2014	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	subpoena Pontoon	3/21/2014	1.00	\$325.00	\$325.00
Ramirez v. Norelco	Velasquez, Jazmin-P/L	27	Docketing		3/21/2014	0.10	\$135.00	\$13.50
Ramirez v. Norelco	Velasquez, Jazmin-P/L	27	Docketing		3/21/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	File MTN and NOM to extend to class discovery	3/21/2014	0.30	\$135.00	\$40.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Re-file Corrected NOM for MTN to extend class discovery	3/21/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	37.2 correspondence to SN	3/24/2014	0.75	\$325.00	\$243.75
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	5	OC Call	37.2 conf call Philips	3/24/2014	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	37.2 correspondence to Philips	3/25/2014	1.50	\$325.00	\$487.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	21	File Review	review sn supplementl response	3/26/2014	1.00	\$325.00	\$325.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	review philips 37.2 correspondence	3/26/2014	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	email to counsel philips, SN	3/26/2014	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Williams, Christopher-Atty	12	Draft non-Pleadings	Mtn to leave to amend complaint and first amended complaint	3/26/2014	2.00	\$450.00	\$900.00
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Drafted NOM to file P's MTN to file FAC and ext Class Discovery	3/27/2014	0.20	\$135.00	\$27.00
Ramirez v. SN, Norelco	williams, Christopher-Atty	13	Review/Revise	mtn for leave to amend complaint and first amended complaint	3/27/2014	0.75	\$450.00	\$337.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	22	Research	Research on discovery during pending motion to dismiss	3/28/2014	1.30	\$325.00	\$422.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	13	Review/Revise	Review/proofread Motion to compel	3/31/2014	0.45	\$325.00	\$146.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	13	Review/Revise	Review of Def Norelco's answer to discovery & inputting citations its answers in motion to compel	3/31/2014	1.00	\$325.00	\$325.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	22	Research	Research on ESI guidelines & principles	3/31/2014	1.00	\$325.00	\$325.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	review philips 37.2 correspondence	3/31/2014	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Download discovery cd into server from Staffing Network	3/31/2014	0.20	\$135.00	\$27.00
Ramirez v. SN, Norelco	Perez, Alma-P/L	24	Admin Work	Issued Summons to Pontoon Solutions, Inc	4/1/2014	0.50	\$135.00	\$67.50
Ramirez v. SN, Norelco	Perez, Alma-P/L	24	Admin Work	Preparing documents to serve Pontoon Solutions, Inc	4/1/2014	0.50	\$135.00	\$67.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	File 1st amended complaint	4/1/2014	0.15	\$135.00	\$20.25
Ramirez v. SN, Norelco	Williams, Christopher-Atty	8	MTN Hearing	mtn on leave to amend and extend discovery	4/1/2014	0.75	\$450.00	\$337.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	37.2 correspondence philips	4/2/2014	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	review philips 37.2 correspondence to P	4/2/2014	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	37.2 correspondnce philips	4/2/2014	0.75	\$325.00	\$243.75
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	confidentiality agreement	4/2/2014	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Served summons on Pontoon at 208 S. LaSalle	4/2/2014	0.20	\$135.00	\$27.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	13	Review/Revise	Mtn to Compel philips	4/2/2014	2.00	\$450.00	\$900.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	review philips 37.2 correspondence to P	4/3/2014	0.25	\$325.00	\$81.25

Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	37.2 correspondence to SN	4/3/2014	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	File executed WOS for Pontoon	4/3/2014	0.15	\$135.00	\$20.25
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	27	Docketing		4/3/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	21	File Review	review SN supplemental 26(a)(1) disclosures	4/4/2014	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Deliver Courtesy Copy to Judge Lee of Ps MTN to Compel Norelco	4/4/2014	0.20	\$135.00	\$27.00
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Prepare cover letter to deliver courtesy copy to Judge Lee of Ps MTN to compel	4/4/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	21	File Review	review SN supplemental production	4/7/2014	1.50	\$325.00	\$487.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	27	Docketing		4/7/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	37.2 correspondence to SN	4/8/2014	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	5	OC Call	37.2 conf call SN	4/9/2014	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	37.2 correspondence SN	4/9/2014	0.75	\$325.00	\$243.75
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Deliver courtesy copy of P's MTN to compel Norelco to Judge Valdez	4/11/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Draft cover letter to deliver courtesy copy to Judge Valdez	4/11/2014	0.15	\$135.00	\$20.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	21	File Review	review discovery production	4/12/2014	2.50	\$325.00	\$812.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	27	Docketing	#53	4/14/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	27	Docketing	#54	4/15/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Williams, Christopher-Atty	8	MTN Hearing	mtn hearing	4/15/2014	0.50	\$450.00	\$225.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	21	File Review	review Philips motion to dismiss	4/15/2014	0.75	\$450.00	\$337.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	review 37.2 correspondence and supplemental 26(a)	4/16/2014	0.00	\$325.00	\$0.00
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	27	Docketing	#58	4/16/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	review sn correspondence to p	4/17/2014	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	37.2 correspondence to philips	4/17/2014	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	5	OC Call	conf call philips	4/18/2014	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	37.2 correspondence to philips	4/22/2014	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	8	MTN Hearing	mtn to compel	4/22/2014	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Perez, Alma-P/L	24	Admin Work	Contacted Judge Lee's Courtroom deputy to have MTN placed last on the call	4/22/2014	0.25	\$135.00	\$33.75
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	27	Docketing	#63	4/22/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Williams, Christopher-Atty	8	MTN Hearing	mtn to stay	4/22/2014	0.50	\$450.00	\$225.00
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	27	Docketing	#68	4/24/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	philips 37.2 corrspndence	5/1/2014	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Organized discovery produced by Ds on server	5/2/2014	1.00	\$135.00	\$135.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	21	File Review	Review Email production	5/3/2014	3.00	\$325.00	\$975.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	22	Research	Research case law for agency liability	5/8/2014	2.50	\$325.00	\$812.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Deliver CC to Judge Lee of P's response to Norelco's Motion to dismiss	5/9/2014	0.20	\$135.00	\$27.00
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Draft cover letter to deliver Judge Lee P's response to Norelco's Motion to dismiss	5/9/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	27	Docketing	#79	5/15/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	27	Docketing	#80	5/15/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Cover ltrr discovery requests documents from Pontoon into word documents scan discovery requests into server, docket deadline for Ps' to answer to discovery requests on abacus	5/21/2014	0.40	\$135.00	\$54.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	11	Draft Pleadings	Response to motion to dismiss	6/3/2014	1.50	\$325.00	\$487.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Create new redwell only for discovery and pleading files	6/4/2014	0.30	\$135.00	\$40.50
Ramirez v. SN, Norelco	Williams, Christopher-Atty	11	Draft Pleadings	Response to motion to dismiss	6/4/2014	1.00	\$450.00	\$450.00
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Draft cover letter to deliver ps response to Pontoons MTN to dismiss to Judge Lee	6/5/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Williams, Christopher-Atty	11	Draft Pleadings	Response to motion to dismiss	6/5/2014	2.00	\$450.00	\$900.00



Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Deliver CC to Judge Lee of Ps response to Pontoons MTN to dismiss	6/6/2014	0.25	\$135.00	\$33.75
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	Review Email production	6/11/2014	6.00	\$325.00	\$1,950.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	Talk to attorney Hoppe	6/12/2014	0.15	\$325.00	\$48.75
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	Talk to Plaintiff Rosa	6/15/2014	0.30	\$325.00	\$97.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	Supplemental discovery	6/15/2014	1.50	\$325.00	\$487.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	Settlement correspondence	6/15/2014	1.00	\$325.00	\$325.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	Settlement letter	6/16/2014	2.50	\$325.00	\$812.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	Talk to Plaintiff Rosa	6/16/2014	0.75	\$325.00	\$243.75
Ramirez v. SN, Norelco	Williams, Christopher-Atty	11	Draft Pleadings	Discovery to Pontoon	6/16/2014	2.50	\$450.00	\$1,125.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	11	Draft Pleadings	Settlement calculations	6/16/2014	1.00	\$450.00	\$450.00
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	6	Corr w/ OC	Deliver discovery requests to Pontoon at 161 N. Clark Street	6/17/2014	0.30	\$135.00	\$40.50
Ramirez v. SN, Norelco	Williams, Christopher-Atty	6	Corr w/ OC	Review demand letter	6/17/2014	0.75	\$450.00	\$337.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	call with OC, Riesco	6/18/2014	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Perez, Alma-P/L	21	File Review	Comparing email production of SN & Norelco	6/23/2014	1.00	\$135.00	\$135.00
Ramirez v. SN, Norelco	Perez, Alma-P/L	24	Admin Work		6/24/2014	0.25	\$135.00	\$33.75
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Mailed out letters to all defendants regarding discovery with attachments	6/24/2014	0.15	\$135.00	\$20.25
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Prepared certificate of service to mail out 3 Notices of Depositions	6/25/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Prepared notices of depositions and certificate of services to mail out to all defendants on case	6/25/2014	0.25	\$135.00	\$33.75
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Deliver discovery answers to Norelco, Pontoon, and Staffing Network attorneys	6/27/2014	0.75	\$135.00	\$101.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	17	Depo	Review file prep for dep	7/1/2014	6.00	\$325.00	\$1,950.00
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	2	Client Call	Contacted interprenet to inquire about Alex Gaytan's availability for depo on July 3, 2014 or anyone else who is available to come for that date	7/1/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Made a request with interprenet to obtain an interpreter for deposition on July 3, 2014	7/2/2014	0.10	\$135.00	\$13.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	17	Depo	Nunez Depo	7/3/2014	6.00	\$325.00	\$1,950.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	17	Depo	Nunez Depo,	7/3/2014	1.00	\$450.00	\$450.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	37.2 Email	7/8/2014	0.15	\$325.00	\$48.75
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	Call OC settlement	7/8/2014	0.15	\$325.00	\$48.75
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	Review file	7/8/2014	1.50	\$325.00	\$487.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	MTN to stay	7/9/2014	7.30	\$325.00	\$2,372.50
Ramirez v. SN, Norelco	Williams, Christopher-Atty	17	Depo	Meet Rosa, prep for Dep	8/24/2014	4.00	\$450.00	\$1,800.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	17	Depo	Depo of Rosa	8/26/2014	8.00	\$450.00	\$3,600.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	5	OC Call	Conference call with OC and Judge Denlow	9/17/2014	0.75	\$325.00	\$243.75
Ramirez v. SN, Norelco	Williams, Christopher-Atty	5	OC Call	Conference call with OC and Judge Denlow	9/17/2014	0.75	\$450.00	\$337.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	11	Draft Pleadings	joint motion to extend stay	9/30/2014	0.75	\$325.00	\$243.75
Ramirez v. SN, Norelco	Perez, Alma-P/L	26	Other-(Specify)	Filed MTN to Ext stay of case	9/30/2014	0.25	\$135.00	\$33.75
Ramirez v. SN, Norelco	Velasquez, Jazmin-P/L	26	Other-(Specify)	Deliver courtesy copy to Judge Lee of Ps' MTN for Ext of time	9/30/2014	0.20	\$135.00	\$27.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	12	Draft non-Pleadings	settlement statement for mediation	10/1/2014	1.00	\$450.00	\$450.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	Settlement statement	10/2/2014	2.50	\$325.00	\$812.50
Ramirez v. SN, Norelco	Williams, Christopher-Atty	13	Review/Revise	revise settlement statement for mediation	10/2/2014	1.00	\$450.00	\$450.00
Ramirez v. SN, Norelco	Perez, Alma-P/L	24	Admin Work	Saved depo transcript into server	10/3/2014	0.25	\$135.00	\$33.75
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	13	Review/Revise	review defendant settlement statements	10/16/2014	1.00	\$325.00	\$325.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	Prep for mediation research case law	10/22/2014	2.50	\$325.00	\$812.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	9	Sttlmnt Conference	Mediation with Judge Denlow	10/23/2014	8.00	\$325.00	\$2,600.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	9	Sttlmnt Conference	Settlement conf w/ Denlow	10/23/2014	10.00	\$450.00	\$4,500.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	Stipulation of settlement	11/3/2014	3.00	\$325.00	\$975.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	Settlement calculations	11/3/2014	2.00	\$325.00	\$650.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	mtn for Preliminary Approval	11/4/2014	3.00	\$325.00	\$975.00

Ramirez v. SN, Norelco	Ayala, Alvar-Atty	13	Review/Revise	Revise Stip of settlement	11/4/2014	1.00	\$325.00	\$325.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	7	Court Status	Status Hearing	11/6/2014	0.50	\$450.00	\$225.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	provide details of settlement admin to ssi and request quote	11/19/2014	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	11	Draft Pleadings	mtn to extend deadline to file mtn for preliminary approval	12/5/2014	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	13	Review/Revise	Review OC comments on settlement docs	12/9/2014	2.00	\$325.00	\$650.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	correspondence to pontoon	12/11/2014	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	13	Review/Revise	revise settlement payment calcs	12/11/2014	0.75	\$325.00	\$243.75
Ramirez v. SN, Norelco	Williams, Christopher-Atty	26	Other-(Specify)	correspondence to judge denlow	12/18/2014	0.25	\$450.00	\$112.50
Ramirez v. SN, Norelco	Williams, Christopher-Atty	5	OC Call	call with OC, and Judge Denlow	12/19/2014	0.50	\$450.00	\$225.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	13	Review/Revise	revise stipulation based on OC commnets	12/24/2014	2.00	\$325.00	\$650.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	6	Corr w/ OC	correspondence to OC	12/24/2014	0.50	\$450.00	\$225.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	5	OC Call	conference call with OC for all parties	12/30/2014	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	correspondence to counsel for SN	1/5/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Williams, Christopher-Atty	8	MTN Hearing	Hearing Status	1/15/2015	0.50	\$450.00	\$225.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	correspondence with OC	1/19/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	correspondence with OC	1/19/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	correspondence with Judge denlow	1/19/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	13	Review/Revise	Review OC comments on stip	1/19/2015	1.00	\$325.00	\$325.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	26	Other-(Specify)	decl	1/19/2015	0.50	\$450.00	\$225.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	Email Denlow	1/20/2015	0.33	\$325.00	\$107.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	correspondence with oc regardign settlement dispute	1/21/2015	0.75	\$325.00	\$243.75
Ramirez v. SN, Norelco	Williams, Christopher-Atty	5	OC Call	conference call with judge denlwo and oc	1/22/2015	1.00	\$450.00	\$450.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	13	Review/Revise	Review Settlement Stip	1/29/2015	2.00	\$450.00	\$900.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	Conference call with OC	2/2/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	11	Draft Pleadings	Draft Final Motion for Extension & File	2/4/2015	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Williams, Christopher-Atty	8	MTN Hearing	Status on Motion Hearing	2/5/2015	0.50	\$450.00	\$225.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	correspondence with oc	2/10/2015	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	22	Research	Review on Defendant's Comments on settlement Stipulation	2/13/2015	2.00	\$325.00	\$650.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	11	Draft Pleadings	File Motion for Preliminary Approval	2/14/2015	0.50	\$450.00	\$225.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	11	Draft Pleadings	Finalizing Exhibit A 1st of Class Members	2/19/2015	2.00	\$325.00	\$650.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	11	Draft Pleadings	Exhibit A & Courtesy Copy	2/20/2015	1.00	\$325.00	\$325.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	8	MTN Hearing	Prepare For Motion Hearing	2/23/2015	0.75	\$450.00	\$337.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	11	Draft Pleadings	Re Drafting Notice	2/24/2015	1.00	\$325.00	\$325.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	8	MTN Hearing	Motion Hearing Preliminary Approval	2/24/2015	0.75	\$450.00	\$337.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	20	Damage Calc	Notice and Damage Calcs	2/25/2015	1.25	\$325.00	\$406.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	11	Draft Pleadings	Filing Motion for Preliminary Approval/Sending email to Judge	2/26/2015	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Williams, Christopher-Atty	11	Draft Pleadings	Notice to Class	2/26/2015	0.50	\$450.00	\$225.00
Ramirez v. SN, Norelco	Herrera, Marcel-P/L	24	Admin Work	Preparing CC for Judge	3/2/2015	0.25	\$135.00	\$33.75
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	21	File Review	Prep for Motion	3/4/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	8	MTN Hearing	Motion Hearing	3/5/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	Email order	3/6/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	corresponde ssi re: preliminary approval	3/12/2015	1.50	\$325.00	\$487.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	Prepare settlement time line spreadsheet	3/22/2015	1.50	\$325.00	\$487.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	email OC re settlement timeline	3/26/2015	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	Voice Script/ English & Spanish	4/13/2015	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	Translate Notice packet	4/16/2015	3.00	\$325.00	\$975.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	settlement payment spreadsheet for ssi purposes	4/22/2015	0.75	\$325.00	\$243.75
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	correspondence to pontoon	4/23/2015	0.10	\$325.00	\$32.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	correspondence with ssi re: settlement spreadsheet	4/23/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	correspondence to OC, Philis re admin	4/24/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	review ssi spreadsheet with claism data	4/27/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	correspondence to OC re Deficiencies	5/4/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	review claims data and deficiencies	5/4/2015	0.50	\$325.00	\$162.50

Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	Talk To Patton Re-Admin Final	5/5/2015	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	21	File Review	Review Admin Spreadsheet to	5/6/2015	1.00	\$325.00	\$325.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	staff discussion regarding instructions to class members on deficiencies	5/6/2015	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	Talk to SSI re deficiencies	5/8/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	Prepare & Email OC Correspondence to Class member with Deficiencies	5/8/2015	1.50	\$325.00	\$487.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	5	OC Call	Conference call with OC	5/11/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	Review Deficiency/Correspondence	5/12/2015	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	review pontoon mtn to dismiss	5/15/2015	0.75	\$325.00	\$243.75
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	Review Info Line	5/20/2015	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	Opt-Out Issue Final Patton	5/21/2015	0.17	\$325.00	\$55.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	Instructions to Class Member on how to Rescind	5/22/2015	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	12	Draft non-Pleadings	review Philips mtn to dismiss	5/23/2015	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Lopez, Jessica-P/L	2	Client Call	Sidney Shirley Confirmation of CF / Email SSI	5/29/2015	0.33	\$125.00	\$41.25
Ramirez v. SN, Norelco	Lopez, Jessica-P/L	2	Client Call	Translation of CF. Explained matter	5/29/2015	0.17	\$125.00	\$21.25
Ramirez v. SN, Norelco	Lopez, Jessica-P/L	2	Client Call	Joann Tostado no CF received / Email SSI & Alvar	5/29/2015	0.25	\$125.00	\$31.25
Ramirez v. SN, Norelco	Lopez, Jessica-P/L	24	Admin Work	Israel wants a translation & update Address / Update Sprdsht	6/2/2015	0.17	\$125.00	\$21.25
Ramirez v. SN, Norelco	Lopez, Jessica-P/L	24	Admin Work	Alejandra Lozanos into Abacus / Update Sprdsht	6/2/2015	0.08	\$125.00	\$10.00
Ramirez v. SN, Norelco	Lopez, Jessica-P/L	2	Client Call	Follow up with Joann Tostado, She's not part of class	6/3/2015	0.17	\$125.00	\$21.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	6	Corr w/ OC	correspondence re late claim forms and opt outs	6/4/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Lopez, Jessica-P/L	24	Admin Work	CF, OO filers issues, phone calls, email SSI, Spdsht, mail class members	6/4/2015	3.00	\$125.00	\$375.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	3	Client Correspondence	correspondence to class members extending deadlne	6/12/2015	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	24	Admin Work	correspondence with ssi re claims and deficiency info	6/19/2015	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	call SSI	6/19/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	24	Admin Work	correspondence with ssi re settlement payments and payroll taxes	6/26/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	review deficient claim form list	7/1/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	call ssi regarding format of claims data spreadsheet	7/1/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	call SSI	7/4/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	correspondence with SSI re late claim forms and specific cures	7/4/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	20	Damage Calc	Review review claims data and prepare settlement payment calcs	7/7/2015	2.00	\$325.00	\$650.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	11	Draft Pleadings	motion for final approval	7/8/2015	3.00	\$325.00	\$975.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	11	Draft Pleadings	SSI decl	7/16/2015	1.00	\$325.00	\$325.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	20	Damage Calc	update settlement payment calcs	7/16/2015	2.00	\$450.00	\$900.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	correspondence ssi regardign declaration and costs	7/17/2015	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	20	Damage Calc	update settlement payment clacs	7/19/2015	2.00	\$325.00	\$650.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	file motion for final approval, courtesy copy, deliver, etc	7/20/2015	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	21	File Review	review final claims data from ssi	7/20/2015	0.50	\$325.00	\$162.50
Ramirez v. SN, Norelco	Williams, Christopher-Atty	13	Review/Revise	Review motion fo final approval	7/20/2015	0.50	\$450.00	\$225.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	11	Draft Pleadings	fee petition	7/21/2015	2.00	\$450.00	\$900.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	26	Other-(Specify)	correspondence ssi	7/22/2015	0.25	\$325.00	\$81.25
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	11	Draft Pleadings	declaration to fee petition	7/22/2015	0.75	\$325.00	\$243.75
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	11	Draft Pleadings		7/22/2015	1.50		\$0.00
Ramirez v. SN, Norelco	Ayala, Alvar-Atty	11	Draft Pleadings		7/22/2015	1.50		\$0.00
Ramirez v. SN, Norelco	Williams, Christopher-Atty	11	Draft Pleadings	Prepare ex A to fee petition	7/22/2015	1.50	\$450.00	\$675.00
								\$87,840.75

Case Name	Firm	Activity Code	Activity	Description	Date		Paid to	Cost
Ramirez v. SN, Norelco	Workers' Law Office, PC	1	1	Complaint Filing	09/11/13		Esquire	\$ 400.00
Ramirez v. SN, Norelco	Workers' Law Office, PC	4	4	Copy deposition Jose, Miguel Rojo Alarcon, invoice ESQ52286	11/14/13		Interprenet	\$ 427.00
Ramirez v. SN, Norelco	Workers' Law Office, PC	3	3	Deposition Rojo Alarcon, Jose, Miguel invoice ESQ33582	12/31/13		Esquire	\$ 110.35
Ramirez v. SN, Norelco	Workers' Law Office, PC	8	8	Interprenet invoice# 44014 interpreter for Lourdes Banuelos	7/3/2014		Interprenet	\$ 525.00
Ramirez v. SN, Norelco	Workers' Law Office, PC	3	3	Deposition of Antonio Nunez invoice#19568	7/3/2014		Bridges	\$ 412.50

[illegible]

# ATTACHMENT 2

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ROSA RAMIREZ, on behalf of herself and all other)  
persons similarly situated, known and unknown, )

Plaintiff, )

v. )

STAFFING NETWORK HOLDINGS, LLC d/b/a )  
STAFFING NETWORK and PHILIPS )  
ELECTRONICS NORTH AMERICA )  
CORPORATION, and PONTOON SOLUTIONS, )  
INC. )

Case No. 13 C 6501

Judge Lee

Magistrate Judge Valdez

**DECLARATION OF CHRISTOPHER J. WILLIAMS**

I, Christopher J. Williams, under penalty of perjury, depose and state the following:

1. I was admitted to practice law in Illinois in 2004 after graduating from Chicago-Kent College of Law. I am also admitted to the General Bar and the Trial Bar of the U.S. District Court for the Northern District of Illinois. Since being admitted to practice law in Illinois, I have been lead counsel or co-counseled in over 300 employment law cases filed in the Northern District of Illinois and the Circuit Court of Cook County, the vast majority of which have been cases arising under the Fair Labor Standards Act (“FLSA”), the Illinois Minimum Wage Law (“IMWL”), the Illinois Wage Payment and Collection Act (“IWPCA”), the Illinois Employee Classification Act (“ECA”) and the Illinois Day and Temporary Labor Services Act (“IDTLSA”). Over fifty of these cases have involved complex class action litigation arising under the IMWL, the IWPCA, or the IDTLSA and/or have proceeded as class collective actions arising under § 216(b) of the FLSA..

2. After being admitted to the Illinois Bar, I was one of the founders of a non-profit legal service organization, Working Hands Legal Clinic, which provides assistance for low-income Illinois residents (defined as earning 150% or below of the poverty level) in the area of

employment law. I served as the Executive Director of the Working Hands Legal Clinic through June 30, 2011. During the period of my tenure as Director, Working Hands Legal Clinic assisted in recovering over \$5,000,000 in owed wages on behalf of low wage Illinois residents. Working Hands Legal Clinic's work was recognized and funded by the Chicago Bar Foundation, the Illinois Equal Justice Foundation, and the Lawyers' Trust Fund of Illinois, among other foundations.

3. I am considered to be an expert in the field of wage and hour law and have served as an expert panelist at continuing legal education seminars sponsored by the American Bar Association, the Chicago Bar Association, Illinois Legal Aid Online, the National Employment Lawyers' Association, the Illinois Employment Lawyers' Association, the National Employment Law Project, the AFL-CIO Lawyers' Coordinating Committee, Chicago-Kent College of Law, DePaul University College of Law, among others. In 2011, I was awarded the *Honorable Abraham Lincoln Marovitz Public Interest Law Award* by Chicago-Kent College of Law. I currently teach a course on legal issues affecting low wage workers at Chicago-Kent College of Law.

4. As Director of the Working Hands Legal Clinic, I served as legal advisor to the sponsor in the Illinois Senate of the 2006 amendments to the Illinois Day and Temporary Labor Services Act ("IDTLA") and was primarily responsible for drafting the legislative language of the amendments. From 2009 through 2011, I served as a member of a task force with the Illinois Department of Labor and the Office of the Attorney General of Illinois to examine the problem of wage theft in Illinois which resulted in the 2011 amendments to the Illinois Wage Payment and Collection Act.

5. In 2011, I started my own firm, Workers' Law Office, P.C., but continued as co-counsel with the staff of Working Hands Legal Clinic in the instant matter.

6. Prior to being admitted to practice law, I served in various capacities as a union leader. From 1989 through 1993, I served as a union officer and president of American Federation of State, County, and Municipal Employees (“AFSCME”) Local 3506, representing teachers at the City Colleges of Chicago. From 1994 through 1997, I was the Assistant Director of Organizing for AFSCME Council 31 of Illinois supervising a staff of ten employees, negotiating collective bargaining agreements, conducting arbitrations, and handling representation petitions and unfair labor practice charges before the National Labor Relations Board. From 1997 through 1999, I was the Director of Organizing for the Service Employees International Union (“SEIU”) Local 73 where I supervised a staff of twelve employees and performed similar duties. From 1999 through 2002, I was the Director of the Chicago Workers’ Center (“CWC”), a non-profit organization, providing worker’s rights trainings and advocating for low wage immigrant workers. In 1999 and 2001, I also served as the CWC’s representative to the Chicago Area Workers’ Rights Initiative (“CAWRI”), a taskforce of community organizations serving at-risk communities working with governmental enforcement agencies, such as the EEOC, OSHA, and the U.S. and Illinois Departments of Labor. I continue to serve as a volunteer attorney for several non-profit worker rights organizations throughout Illinois.

7. The attorneys’ fee time sought in this motion is recorded and billed as follows on an Excel spreadsheet that is maintained on the Workers’ Law Office, P.C. server. The spreadsheet file created for the instant matter is named “Ramirez v. Staffing Network et al.” Whenever I have performed work on behalf of Plaintiff and the Class in connection with this action against Defendants, I have made entries into this spreadsheet. These entries consist of a description of the work I performed on the date of the entry as well as the amount of time I spent during the day in performing the work described.



5. Most recently, on January 29, 2014 District Court Judge Grady awarded me an hourly rate of \$425.00 per hour in *Alvarado et. al v. Cypress REO Services, LLC*, Case No. 13 C 0594, in response to a fee petition. In addition, on July 31, 2013, District Court Judge Kennelly awarded me an hourly rate of \$400.00 per hour in *Neal et al. v. K-Five Construction*, Case No. 12 C 1044, in response to a fee petition. In addition, Judge Kennelly awarded Plaintiffs' Counsel a fee award increased by a 5.5% multiplier based on the excellent result achieved. Prior to that, on April 3, 2013, District Court Judge Gettleman awarded me a rate of \$400.00 per hour in the case *Ocampo et al. v. Super Jim's Inc., et al.*, Case. No. 10 C 1800. On May 12, 2011, District Court Judge Pallmeyer likewise awarded me a rate of \$400.00 per hour in the case *Gallegos et al. v. Codex Exc, Inc., et al.*, Case No. 10 C 5665. Since May 12, 2011, when Judge Pallmeyer first awarded me an hourly rate of \$400.00 per hour through the present.

6. I have been appointed class counsel in multiple cases in the Northern District of Illinois involving complex class litigation arising under the IMWL, IWPCA, IDTLSA and other relevant state and federal laws. In addition, I have been appointed class counsel by courts in the Northern District of Illinois and the Circuit Court of Cook County in over twenty complex class action matters, including five in 2015 *Martinez et al. v. Staffing Network et al.*, Case No. 13 C 1381 (June 30, 2015,N.D. Ill, Judge Deryeghiayan) (D.E. 141); *Barrera et al. v. Staffing Network et al.*, Case No. 13 C 5889 (June 30, 2015,N.D. Ill, Judge Deryeghiayan) (D.E. 70); *Creal v. Staffing Solutions Southeast et al.* Case No. 13 C 7592 (April 7, 2015, N.D. Ill, Judge Valdez) (D.E. 82); *Alvarado et al. v. Neptun Light Inc., et al.* Case No. 13 C 3199 (May 7, 2015, N.D. Ill, Judge Valdez) (D.E. 68) *Alvarado et al. v. Aerotek, Inc.*, Case No. 13 C 6843 (February 12, 2015, N.D. Ill, Judge Valdez)(D.E. 46).<sup>1</sup>

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<sup>1</sup> See also *Dickerson v. Roger's Premier Enterprises, LLC*, Case No. 13-7154 (January 05, 2015, ND IL, Judge Finnegan) (D.E. No. 58); *Hernandez v. ASG Staffing, Inc.*, Case No. 12-2068 (December 11, 2014, ND IL, Judge Bucklo) (D.E. No. 87); *Dean, et al. v. Eclipse Advantage Inc., et al.*, Case No. 11-8285

Based on my skill and experience, my requested rate of \$450.00 per hour is fair and reasonable within the Chicago legal community for work of this nature and is consistent with rates previously awarded to the undersigned.

7. Since the inception of the case, I have spent at least 44 hours on this matter. A computer printout detailing the work performed and time expended by me and other attorneys on this matter is attached to Plaintiffs' Motion for Default Judgment as Attachment 1.

9. I am not suffering any impediments and am competent to testify to all of the foregoing.

I declare under penalty of perjury that the foregoing is true and correct.

s/Christopher J. Williams  
Christopher J. Williams

Dated: July 22, 2015

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(December 17, 2013, ND IL, Magistrate Judge Mason) (D.E. No. 149); *Rangel, et al. v. Commonwealth Hospitality, LLC et al.*, Case No. 12-3809 (December 13, 2013, ND IL, Judge Bucklo) (D. E. 66); *Blancas, et al. v. Cairo and Sons Roofing, Co. Inc.*, Case No. 12-2636 (December 12, 2013, ND IL, Judge Durkin) (D.E. No. 43); *Gallegos et al. v. Midway Building Services, LTD et al.*, Case No. 12-4032 (October 02, 2013, ND IL, Judge Finnegan) (D.E. No. 67); *Craig v. EmployBridge et al.*, Case No. 11 C 3818 (April 4, 2013, ND IL, Judge Pallmeyer)(D.E. No. 75); *Smith et al. v. Dollar Tree Distribution, Inc.*, Case No. 12-3240 (February 27, 2013, ND IL, Magistrate Judge Brown) (D.E. No. 35); *Ramirez et al. v. Paramount Staffing, Inc. et al.*, Case No. 11-4163 (January 29, 2013, ND IL, Magistrate Judge Finnegan)(D.E. No. 40); *Bautista et al. v. Real Time Staffing Services, Inc. et al.*, Case No. 10-0644 (August 28, 2012, ND IL, Judge Gettleman)(D.E. No. 58); *Ochoa et al. v. Fresh Farms International Market, Inc. et al.*, Case No. 11-2229 (July 10, 2012, ND IL, Judge Dow)(D.E. No. 29); *Francisco, et al. v. REM Staffing, et al.*, Case No. 11-2162 (May 24, 2012, ND IL, Judge Grady)(D.E. No. 43); *Jones et al. v. Simos Insourcing Solutions, Inc. et al.*, Case No. 11-3331 (May 4, 2012, ND IL, Judge Bucklo)(D.E. No. 35); *Alvarez et al. v. Staffing Partners, Inc. et al.*, Case No. 10-6083 (January 17, 2012, ND IL, Magistrate Judge Finnegan)(D.E. No. 63); *Andrade et al. v. Ideal Staffing Solutions, Inc. et al.*, Case No. 08-4912 (March 29, 2010, ND IL, Magistrate Judge Denlow) (D.E. No. 142); *Arrez et al. v. Kelly Services, Inc.*, Case No. 07-1289 (October 08, 2009, ND IL, Judge Leinenweber) (D.E. No. 177); *Ortegon, et al. v. Staffing Network, Inc.*, Case No. 06 CH 12679 (July 24, 2009, Circuit Court of Cook County); *Acosta, et al. vs. Scott Labor, et al.*, Case No. 05-2518 (March 10, 2008, ND IL, Judge Gettleman)(D.E. No. 120); *Herrera, et al. v. Chicago Mattress, Inc.*, Case No. 06-1872 (April 27, 2007, ND IL, Judge Filip)(D.E. No. 49).

# ATTACHMENT 3

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ROSA RAMIREZ, on behalf of herself and all other)  
persons similarly situated, known and unknown, )

Plaintiff, )

v. )

STAFFING NETWORK HOLDINGS, LLC d/b/a )  
STAFFING NETWORK and PHILIPS )  
ELECTRONICS NORTH AMERICA )  
CORPORATION, and PONTOON SOLUTIONS, )  
INC. )

Case No. 13 C 6501

Judge Lee

Magistrate Judge Valdez

**DECLARATION OF ALVAR AYALA**

I, Alvar Ayala, under penalty of perjury, depose and state the following:

1. I have been admitted to practice law in the State of Illinois and before the United States District Court for the Northern District of Illinois since 2008, after graduating from the University of Michigan Law School.

2. I served as a staff attorney with Working Hands Legal Clinic, a 501(c)(3) organization providing free legal assistance to low wage workers in the greater Chicago area, between 2008 and July 2011. Between July 2011 and July 2012, I served as Director of Working Hands Legal Clinic. I also served as a staff attorney with the Farmworker Advocacy Project, a non-profit legal service clinic serving agricultural workers, from March 2009 through July 2010. From July 2012 to date, I have worked as a staff attorney with Workers' Law Office, P.C.

3. As a staff attorney at the Working Hands Legal Clinic, the Farmworker Advocacy Project, and Workers' Law Office, P.C., I have served as lead counsel or co-counsel in over 120 cases filed in the Circuit Court of Cook County or in the Northern District of Illinois. The majority of these claims have arisen under the Fair Labor Standards Act ("FLSA"), Illinois

Minimum Wage Law (“IMWL”), the Illinois Wage Payment and Collection Act (“IWPCA”), Employee Classification Act (“ECA”), the Illinois Day and Temporary Labor Services Act (“IDTLSA”), and the Fair Credit Reporting Act (“FCRA”), among other employment statutes. The majority of these cases have involved complex class action litigation and/or proceeded as collective actions pursuant to Section 216(b) of the FLSA. I have been appointed as class counsel by the U.S. District Court for the Northern District of Illinois in several of these matters.<sup>1</sup>

4. As Director for the Working Hands Legal Clinic, I oversaw the organization’s education, outreach, and litigation initiatives. I also assisted in drafting the regulations implementing the 2011 amendments to the Illinois Wage Payment and Collection Act, 820 ILCS 115/1 *et seq.*, which provide stronger protections against wage theft for the low wage workers in Illinois.

5. As a law student at the University of Michigan Law School, I received various fellowships to perform public interest legal work at Chicago-based nonprofit organizations, including the Chicago Interfaith Committee on Worker Issues, currently known as ARISE, and

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<sup>1</sup> Plaintiffs’ Counsel has regularly been designated as class counsel in class action employment litigation including: *Martinez et al. v. Staffing Network et al.*, Case No. 13 C 1381 (June 30, 2015, N.D. Ill., Judge Deryeghiayan) (D.E. 141); *Barrera et al. v. Staffing Network et al.*, Case No. 13 C 5889 (June 30, 2015, N.D. Ill., Judge Deryeghiayan) (D.E. 70); *Creal v. Staffing Solutions Southeast et al.* Case No. 13 C 7592 (April 7, 2015, N.D. Ill., Judge Valdez) (D.E. 82); *Alvarado et al. v. Neptun Light Inc., et al.* Case No. 13 C 3199 (May 7, 2015, N.D. Ill., Judge Valdez) (D.E. 68) *Alvarado et al. v. Aerotek, Inc.*, Case No. 13 C 6843 (February 12, 2015, N.D. Ill., Judge Valdez) (D.E. 46); *Dickerson v. Roger’s Premier Enterprises, LLC*, Case No. 13-7154 (January 05, 2015, ND IL, Judge Finnegan) (D.E. No. 58); *Hernandez v. ASG Staffing, Inc.*, Case No. 12-2068 (December 11, 2014, ND IL, Judge Bucklo) (D.E. No. 87); *Dean, et al. v. Eclipse Advantage Inc., et al.*, Case No. 11-8285 (December 17, 2013, ND IL, Magistrate Judge Mason) (D.E. No. 149); *Rangel, et al. v. Commonwealth Hospitality, LLC et al.*, Case No. 12-3809 (December 13, 2013, ND IL, Judge Bucklo) (D. E. 66); *Blancas, et al. v. Cairo and Sons Roofing, Co. Inc.*, Case No. 12-2636 (December 12, 2013, ND IL, Judge Durkin) (D.E. No. 43); *Gallegos et al. v. Midway Building Services, LTD et al.*, Case No. 12-4032 (October 02, 2013, ND IL, Judge Finnegan) (D.E. No. 67); *Craig v. EmployBridge et al.*, Case No. 11 C 3818 (April 4, 2013, ND IL, Judge Pallmeyer) (D.E. No. 75); *Smith et al. v. Dollar Tree Distribution, Inc.*, Case No. 12-3240 (February 27, 2013, ND IL, Magistrate Judge Brown) (D.E. No. 35);

Working Hands Legal Clinic. While a student at the University of Michigan School of Law, I served as an Executive Editor for the Michigan Journal of Race and Law.

6. The attorneys' fee time sought in this motion is recorded and billed as follows on an Excel spreadsheet that is maintained on the Workers' Law Office, P.C. server. The spreadsheet file created for the instant matter is named "Ramirez v. Staffing Network et al." Whenever I have performed work on behalf of Plaintiff and the Class in connection with this action against Defendants, I have made entries into this spreadsheet. These entries consist of a description of the work I performed on the date of the entry as well as the amount of time I spent during the day in performing the work described.

7. Most recently, on February 7, 2014, District Court Judge Grady awarded me a rate of \$300.00 per hour in the case *Alvarado et al. v. Cypress REO Services LLC*, Case No 13 C 0594. On July 31, 2013, District Court Judge Kennelly awarded me a rate of \$300.00 per hour in the case *Neal, et al. v. K-Five Construction Corp.*, Case No. 12 C 1044. On April 3, 2013, District Court Judge Gettleman awarded me a rate of \$275.00 per hour in the case *Ocampo, et al. v. Super Jim's, et al.*, Case No. 10 C 1800. On May 12, 2011, District Court Judge Pallmeyer awarded me a rate of \$250.00 per hour in the case *Gallegos v. Codex Exc, Inc., et al.*, 10 C 5665. On December 1, 2008, District Court Judge St. Eve awarded me \$230.00 per hour in the case of *Valadez v. F. Espinoza Landscaping, Inc., et al.*, Case No. 08 C 3702. On September 30, 2010, Judge Gillespie of the Municipal Division for the Circuit Court of Cook County, Illinois, also awarded me \$230.00 per hour in the case *Sangurima v. J.N. Construction et al.*, Case No. 08 M1 115849.

Based on my skill and experience, my requested rate of \$325.00 per hour is fair and reasonable within the Chicago legal community for work of this nature and is consistent with rates previously awarded to the undersigned.

7. Since the inception of the case, I have spent at least 166 hours on this matter. A computer printout detailing the work performed and time expended by me and other attorneys on this matter is attached to Plaintiff's Fee Petition, as Exhibit A.

8. I am not suffering any impediments and am competent to testify to all of the foregoing.

I declare under penalty of perjury that the foregoing is true and correct.

s/Alvar Ayala  
Alvar Ayala

Dated: July 22, 2015